

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

T-Rex Property AB,

Plaintiff,

v.

National CineMedia, LLC.,

Defendant.

Civil Action No.: 2:16-cv-681

JURY TRIAL DEMANDED

**JOINT MOTION FOR AN EXTENSION OF TIME
FOR DEFENDANT TO ANSWER THE COMPLAINT AND RESCHEDULE THE
SCHEDULING CONFERENCE**

Plaintiff T-Rex Property AB (“T-Rex”) and Defendant National CineMedia, LLC (“National CineMedia”) respectfully submits this joint motion to extend Defendant National CineMedia time to answer Plaintiff’s Complaint by 30 days to September 14, 2016 and to reschedule the scheduling conference from August 30, 2016 to a convenient time for the Court no sooner than September 28, 2016. This is Defendant’s second request for an extension. Currently, Defendant’s answer to the Complaint is due on August 16, 2016. In support, the parties state as follows:

On July 14, 2016 Defendant requested an extension of 31 days. (Dkt 6). This was removed by the Clerk as “Filed in Error”. On July 15, 2016 the Defendant requested an extension of 30 days. (Dkt 7). On July 15, 2016, this Court granted Defendant’s Unopposed Motion for an extension of time to August 15, 2016 to file an answer or otherwise respond to the original Complaint.

On August 2, 2016 the Court Ordered the Scheduling Conference. (Dkt 8), setting this matter for an initial pre-trial conference on August 30, 2016. This Order also set additional deadlines, which the parties seek to extend.

The parties have continued to investigate issues surrounding the asserted patents-in-suit and enter into further discussion in an attempt to better understand the Parties' positions, reach a resolution and conserve judicial resources.

On August 12, 2016, counsel for T-Rex and National CineMedia conferred and agreed to the substance of this motion.

This requested extension will not delay these proceedings or prejudice Plaintiff in any foreseeable manner.

For these reasons, the parties submit this Motion and request that the Court extend the deadline for Defendant's time to answer or otherwise respond to the Complaint to September 14, 2016 and reschedule the scheduling conference to a date no sooner than September 28, 2016.

A proposed Order granting this unopposed Motion is attached hereto.

Dated: August 12, 2016

Respectfully submitted,

/s/ Steven R. Daniels

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*Attorneys for Defendant
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CERTIFICATE OF SERVICE

I hereby certify that on August 12, 2016, I electronically filed the foregoing filing with the Clerk of Court using the CM/ECF system which will send notification of such filing via electronic mail to all counsel of record.

/s/ Steven R. Daniels

Steven R. Daniels